

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
ST. LOUIS DIVISION

CASSIE GREEN a.k.a
CASSIE HAYES- MCDONALD,

Plaintiff,

v.

AMERICOLLECT, INC. et al.,

Defendant.

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CASE NO. 4:20-cv-01096-SRC

**DEFENDANT AMERICOLLECT, INC.'S MOTION FOR JUDGMENT ON THE
PLEADINGS**

COMES NOW Defendant, Americollect, Inc. (“Defendant” or “Americollect”), by and through undersigned counsel, and files its Motion for Judgment on the Pleadings pursuant to Fed. R. Civ. P. 12(c) as follows:

I.

1. Pursuant to Federal Rule of Civil Procedure 12(c), Defendant moves for judgment on the pleadings all claims alleged against it by Plaintiff, as well as on all of Plaintiff’s claims for damages, on the basis that Americollect did not violate any provisions of either the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. §1681, *et seq* or the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692, *et seq*.

2. Pursuant to Local Rule 4.01, a Memorandum of Law is attached to this instant Motion and incorporated herein.

3. For the reasons fully explained in the attached Memorandum, this Court should grant Americollect’s Motion for Judgment on the Pleadings and dismiss Plaintiff’s case in its entirety with prejudice.

WHEREFORE, PREMISES CONSIDERED, Defendant AMERICOLLECT, INC., respectfully requests that this Court grant Defendant's Motion for Judgment on the Pleadings, dismiss all claims against Defendant with prejudice and grant Defendant all other relief entitled.

Dated March 19, 2021.

Respectfully submitted,

MALONE FROST MARTIN PLLC

/s/ PATRICK A. WATTS

PATRICK A. WATTS, ESQ.

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**COUNSEL FOR DEFENDANT
AMERICOLLECT, INC.**

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been forwarded to counsel via ECF on this 19th day of March, 2021; to:

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/s/ Patrick A. Watts

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